

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JONATHAN T. BURNS and LAUREN M.
BURNS as the parents and natural guardians of
MMB, a minor, and in their own right

vs.

SUNBEAM PRODUCTS, INC. AND
NEWELL BRANDS, INC.

CIVIL ACTION

NO. 2:21-CV-04373

**STIPULATION TO DISMISS NEWELL BRANDS, INC. AS A DEFENDANT,
WITHOUT PREJUDICE**

It is hereby STIPULATED by the parties that the Defendant, Newell Brands, Inc., is DISMISSED as a party Defendant in this action, and all claims and cross claims against said Defendant are dismissed, without prejudice.

It is further STIPULATED that, should discovery uncover facts which indicate that Newell Brands, Inc. did have involvement in the incident which allegedly caused the Plaintiffs' injuries, Plaintiff can re-assert a claim against Newell Brands, Inc. and Newell Brands Inc. agrees to waive any defense based on the applicable Statute of Limitations.

The parties agree that this Stipulation may be executed in any number of counterparts, each of which shall be enforceable against the parties that execute such counterparts, and all of which shall constitute one instrument.

BY: /s/ Kevin P. O'Brien
Kevin P. O'Brien, Esquire
Stampone, O'Brien, Dilsheimer Law
500 Cottman Avenue, Cheltenham, PA 19012
Counsel for Plaintiffs

BY: /s/ Brian D. Boyle
Brian D. Boyle, Esquire
Mintzer, Sarowitz, Zeris, Ledva & Meyers
Centre Square West Tower, 1500 Market Street, Suite 4100
Philadelphia, PA 19102
Counsel for the Defendants, Sunbeam Products, Inc. and Newell Brands, Inc.